

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

GUARDIAN INDUSTRIES CORP.,

Plaintiff,

v.

DELL, INC.; GATEWAY, INC.;  
HEWLETT-PACKARD COMPANY; ACER INC.;  
ACER AMERICA CORPORATION; AOC INTERNATIONAL;  
ENVISION PERIPHERALS, INC.; TPV TECHNOLOGY, LTD.;  
TPV INTERNATIONAL (USA), INC.;  
AU OPTRONICS CORPORATION;  
AU OPTRONICS CORPORATION AMERICA a/k/a  
AU OPTRONICS AMERICA, INC.;  
BENQ CORPORATION; BENQ AMERICA CORPORATION;  
CHUNGHWA PICTURE TUBES, LTD. a/k/a  
CHUNGHWA PICTURE TUBES COMPANY;  
TATUNG COMPANY;  
TATUNG COMPANY OF AMERICA, INC.;  
BOE HYDIS TECHNOLOGY COMPANY, LTD.;  
BOE HYDIS AMERICA INC.; CHI MEI OPTOELECTRONICS;  
COMPAL ELECTRONICS, INC.;  
HANNSTAR DISPLAY CORPORATION; JEAN CO., LTD.;  
LITE-ON TECHNOLOGY CORPORATION;  
LITE-ON, INC. a/k/a LITEON TRADING USA, INC.;  
MAG TECHNOLOGY COMPANY, LTD.;  
MAG TECHNOLOGY USA, INC.;  
PROVIEW INTERNATIONAL HOLDINGS, LTD.;  
PROVIEW TECHNOLOGY, INC.;  
PROVIEW ELECTRONICS COMPANY, LTD.; and  
QUANTA DISPLAY, INC.

Defendants.

Case No.: 05-27-SLR

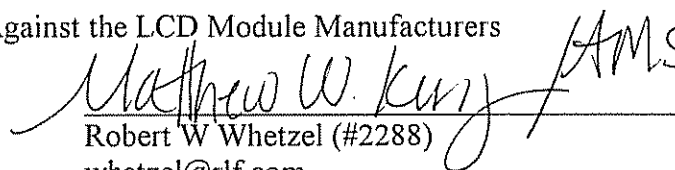
Jury Trial Demanded

MOTION BY TATUNG COMPANY, TATUNG COMPANY OF AMERICA, INC., AND  
JEAN COMPANY TO JOIN IN THE MOTION TO STAY THE CASE PENDING  
RESOLUTION AGAINST THE LCD MODULE MANUFACTURERS

Defendants Tatung Company ("Tatung"), Tatung Company of America, Inc ("Tatung America"), and Jean Company hereby incorporate and join in Dell's motion to stay the litigation against the customer defendants. Specifically Tatung, Tatung America, and Jean request that the case be stayed against them pending resolution of the case against the LCD module manufacturers.

A stay in this case is warranted because Tatung, Tatung America, and Jean do not design or manufacture any LCD modules. Instead, they are simply customers of such modules, and they possess virtually no knowledge regarding the design or components of the LCD panels in the accused products. It will greatly simplify this case and promote judicial economy if this case proceeds only against the LCD module manufacturers. Because each of the LCD modules or products containing LCD modules that are purchased or sold by Tatung, Tatung America, and Jean are manufactured by one of the defendants named in this litigation, Guardian will not be prejudiced by any such stay.

The grounds for this motion are set forth in the accompanying Opening Brief by Tatung Company, Tatung Company of America, Inc., and Jean Company to Join in the Motion to Stay the Case Pending Resolution Against the LCD Module Manufacturers.

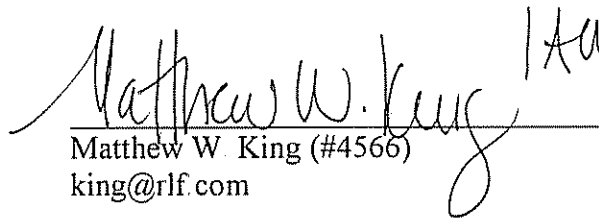
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 Chunghwa Picture Tubes Company; Tatung  
 Company; Tatung Company of America,  
 Inc.; and Jean Co., Ltd.*

Dated: June 14, 2005

**Rule 7.1.1 Certification**

During a teleconference with Plaintiff's counsel, the Defendants raised the issue of staying the case against all of the defendants other than the LCD module manufacturers.

Plaintiff's counsel stated that it would oppose any such motion.

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 14, 2005 I electronically filed the foregoing with the Clerk of Court using CM/ECF which will send notification of such filing(s) to the following and which has also been served as noted:

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I hereby certify that on June 14, 2005 the foregoing documents were sent to the following non-registered participants in the manner indicated:

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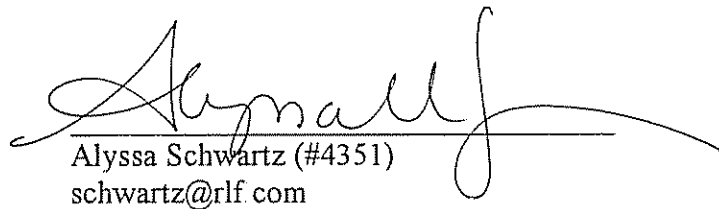
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